Fort Monmouth Updated Phase I Comments

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Attached are our review comments pertaining to Fort Monmouth's updated Phase I report.

Please contact Helen Shannon of my staff x4706 as to the dates of consideration for the meeting with Fort Monmouth and NJDEP personnel. We would also appreciate your forwarding us NJDEP's Phase I comments as soon as you receive them.

Attachment

cc: Helen Shannon

## Comments Pertaining to Ft. Monmouth's Updated Phase I IAS Report

- 1. With regard to the sludge drying beds:
  - a) p 3.3 It was noted: "Sludge and supernatant liquid was removed from the EA STP's and the plant was sanitized and sterilized". What is meant by sanitized and sterilized?
  - b) p 3.2, 3.3 All sites with sludge drying beds at Ft. Monmouth's Main Post, CWA and EA were potential sources of contamination. Despite the fact that they are closed now and "the quantities of sludges and supernatants were removed", these areas should be tested for priority pollutants. (Groundwater and soil samples should be taken and analyzed for priority pollutants.) The sludge which accumulated over many years may be a major source of high content levels of chromium, lead, and mercury.

## 2. General comments:

a) The geology of the Main Post, CWA and EA is conducive to migration via surface and subsurface routes. Since no data are available on subsurface migration and limited data are available on surface migration, a groundwater monitoring program would help to determine if the contaminants are migrating and in what direction they are migrating.